

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

ODILON S. CELESTIN, WIDMIR ROMELIEN,  
MARIE LUCIE ST VIL, JEANNETTE  
VALEUS, VINCENT MARAZITA, and on  
behalf of all others similarly situated,

Plaintiffs,

- against -

MICHEL JOSEPH MARTELLY, JOCELERME  
PRIVERT, JOVENEL MOISE, THE WESTERN  
UNION COMPANY, d/b/a Western Union  
Holdings, Inc, Western Union Financial Services,  
Inc., and through other subsidiaries and affiliates,  
CARIBBEAN AIR MAIL, INC., d/b/a CAM,  
UNIBANK, S.A., UNITRANSFER USA, INC.,  
UNIGESTION HOLDING, S.A., d/b/a DIGICEL  
HAITI, NATCOM S.A., and THE  
GOVERNMENT OF HAITI,

Defendants.

18-cv-7340 (LDH) (PK)

**RULE 7.1 DISCLOSURE  
STATEMENT**

Pursuant to Federal Rule of Civil Procedure 7.1 and Rule 50.1(c) of the  
Guidelines for the Division of Business Among District Judges, the undersigned counsel  
for Defendant Unigestion Holding, S.A. (“Digicel Haiti”), a nongovernmental corporate  
party, certifies that its parent company is Digicel Group Limited. Counsel further  
certifies that no publicly held corporation owns more than 10% of Digicel Haiti’s stock.

Dated: New York, New York  
February 28, 2019

Respectfully submitted,

/s/ James H.R. Windels

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*Attorney for Defendant Unigestion Holding,  
S.A.*